

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF OKLAHOMA

3
4 QUINDA BEESON,
5 Plaintiff,

6 vs. No. CIV-20-327-SLP

7 SAFECO INSURANCE COMPANY OF
8 AMERICA,
9 Defendant.

10 VIRTUAL VIDEO-RECORDED DEPOSITION OF
11 CORPORATE REPRESENTATIVE DIANA FOX
12 Taken on Behalf of the Plaintiff
On January 24, 2022, beginning at 9:32 a.m.
All Parties Appearing Remotely Via Zoom

13 APPEARANCES:

14 Appearing on behalf of the PLAINTIFF

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18 Appearing on behalf of the DEFENDANT

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23
24 Reported By: Becky C. Dame, CSR, RPR
25

1 records?

2 A Yes.

3 Q Those records were not in the original
4 claim file associated with Safeco's handling of this
5 claim; true?

6 A That's true.

7 Q And Safeco is not continuing to handle
8 Mrs. Beeson's UM claim; correct?

9 A I would not say that is correct.

10 Q Okay.

11 A It's still open. We're ready to negotiate
12 it.

13 Q Okay. Did you look at the claim file from
14 the continued handling the UM claim post litigation?

15 A I did not.

16 Q Do you know whether or not there is a
17 post-litigation UM claim-handling file?

18 A I assume there is. It's still open.

19 Q Given that one of the topics you're
20 testifying on today are the facts that Safeco
21 intends to rely at trial on, does Safeco intend to
22 utilize any material within that continuing claim
23 file in defense of the allegations made by
24 Mrs. Beeson here?

25 MR. O'CONNOR: Objection to form.

1 THE WITNESS: I don't know.

2 BY MR. ROWE:

3 Q Do you know whether or not Safeco has
4 revised its evaluation of the UM benefits due to
5 Mrs. Beeson?

6 A I have not seen anything after the
7 litigation.

8 Q Okay. Mrs. Fox, do you believe that you
9 have understood the questions that I have asked of
10 you today?

11 A I think so.

12 Q Are there any answers to questions or
13 testimony that you would like to revise or edit at
14 this time?

15 A No.

16 MR. O'CONNOR: Object to the form.

17 She'll review it when she gets the
18 transcript.

19 MR. ROWE: Sure. I just -- I heard a
20 lawyer do that a long time ago, Ms. Fox, and I'm --
21 you know, after we take a break, I do it.

22 THE WITNESS: None that I remember.

23 MR. ROWE: He was a defense lawyer, Bill,
24 that I think recently retired.

25 BY MR. ROWE: